

**No. 04-19-00192-CR  
No. 04-19-00193-CR  
(Consolidated Causes)**

**STATE OF TEXAS**

§

**IN THE COURT OF APPEALS**

FILED IN  
4th COURT OF APPEALS  
SAN ANTONIO, TEXAS  
7/12/2019 3:11 PM

**VS.**

§

**FOURTH JUDICIAL DISTRICT**

KEITH E. HOTTLE  
CLERK

**JOHNNY JOE AVALOS**

§

**BEXAR COUNTY, TEXAS**

UNOPPOSED MOTION FOR EXTENSION  
OF TIME TO FILE OPENING BRIEF

From the 437<sup>th</sup> District Court of Bexar County, Texas  
Trial Court Nos. 2018-CR-7068 & 2016CR10374  
Hon. Lorie Valenzuela, Judge Presiding

The Appellant's brief is due to be filed on Friday, July 12, 2019. The undersigned, a solo practitioner that handles trial and appellate law, presents grounds that he submits are extenuating, and requests a third and final, fourteen-day extension of time to file his brief, given finished, and due to be finished projects, as follows:

1. Memorandum in support of motion to suppress, in *United States v. Miguel Angel Lozano Alvarez*, Cause No. V-18-CR-17, filed on Monday, July 8, 2019;
2. Petition for a writ of certiorari with the U.S. Supreme Court, in *Luis Arnaldo Baez v. Lorie Davis*, stemming from a denial of Baez' 28 U.S.C. 2254 certificate of appealability, filed Monday, June 24, 2019;
3. Memorandum in support of motion to suppress, in *United States v. Mark Rodriguez*, Cause No. SA-18-CR-572-FB, filed on Friday, June 21<sup>st</sup>, 2019;

4. Trial preparation in *State of Texas v. Ivan Esparza-Quintanilla*, Cause No. 611810, set for jury trial on Monday, July 22, 2019, in County Court at Law #11;
5. Opening brief in *United States v. William Jonas, III*, Cause No. 18-50468, involving a multi-count, week-long trial with a voluminous record, due to be filed on Monday, August 9, 2019, with the Fifth Circuit Court of Appeals.

**On Wednesday, June 12, 2019, the undersigned spoke to Ms. Shamika Roberts, of the Bexar County Appellate Section, who expressed no opposition to the requested, final extension.**

WHEREFORE, Appellant respectfully requests that this Court grant the requested, and final 14-day extension of time to file his opening brief, to and including Friday, July 26, 2019.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on this the 12<sup>th</sup> day of July, 2019 a copy of the foregoing “Unopposed Motion for Extension of Time to File Opening Brief,” has been delivered to the Appellate Section of the Bexar County District Attorney’s Office, *via* the Texas Efile system.

/s/ JORGE G. ARISTOTELIDIS